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3 **UNITED STATES DISTRICT COURT**  
4 **NORTHERN DISTRICT OF CALIFORNIA**  
5 **SAN FRANCISCO DIVISION**

6 **IN RE GOOGLE PLAY STORE**  
7 **ANTITRUST LITIGATION**

8 THIS DOCUMENT RELATES TO:

9 *State of Utah et al. v. Google LLC et al.*,  
Case No. 3:21-cv-05227-JD

10 *In re Google Play Consumer Antitrust*  
11 *Litigation*, Case No. 3:20-cv-05761-JD

Case No. 3:21-md-02981-JD

**DECLARATION OF**  
**BRENDAN BENEDICT IN SUPPORT**  
**OF PLAINTIFFS' OPPOSITION TO**  
**DEFENDANTS' MOTION TO**  
**EXCLUDE MERITS OPINIONS OF**  
**DR. MARC RYSMAN**

Judge: Hon. James Donato

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1 I, BRENDAN BENEDICT, declare as follows:

2 1. I am an attorney admitted to practice in New York and Washington, DC and  
3 admitted *pro hac vice* to practice before this Court in the above-captioned litigation. I am the  
4 founding principal of the law firm of Benedict Law Group PLLC and am serving as a Special  
5 Assistant Attorney General with the Utah Office of the Attorney General in this litigation. I have  
6 personal knowledge of the matters stated herein and, if called upon, I could and would  
7 competently testify thereto.

8 2. Attached hereto as **Exhibit A** is a true and correct copy of Jeffrey Church &  
9 Neil Gandall, *Complementary Network Externalities and Technological Adoption*, 11 Int'l J. of  
10 Indus. Org. 239 (1993).

11 3. Attached hereto as **Exhibit B** is a true and correct copy of Avinash K. Dixit &  
12 Joseph E. Stiglitz, *Monopolistic Competition and Optimum Product Diversity*, 67 Am. Econ.  
13 Rev. 297 (1977).

14 4. Attached hereto as **Exhibit C** is a true and correct copy of Anindya Ghose &  
15 Sang Pil Han, *Estimating Demand for Mobile Applications in the New Economy*, 60 Mgmt.  
16 Science 1470 (2014).

17 5. Attached hereto as **Exhibit D** is a true and correct copy of Daniel Ershov,  
18 *Variety-Based Congestion in Online Markets: Evidence from Mobile Apps* (Aug. 10, 2022).

19 6. Attached hereto as **Exhibit E** is a true and correct copy of Matthew Gentzkow,  
20 *Valuing New Goods in A Model with Complementarity: Online Newspapers*, 97:3 Am. Econ.  
21 Rev. 713 (June 2007), which was marked as exhibit PX2754 in this litigation.

22 7. Attached hereto as **Exhibit F** is a true and correct copy of excerpts from the  
23 transcript of the deposition of Dr. Matthew Gentzkow, taken in this matter on March 7-8, 2023.

24 8. Attached hereto as **Exhibit G** is a true and correct copy of Jerry A. Hausman &  
25 Gregory K. Leonard, *The Competitive Effects of New Product Introduction: A Case Study*, 50 J.  
26 of Indus. Econ. 237 (Sept. 2002).

27 DECLARATION OF BRENDAN BENEDICT IN SUPPORT OF PLAINTIFFS' OPPOSITION TO DEFENDANTS' MOTION  
28 TO EXCLUDE MERITS OPINIONS OF DR. RYSMAN  
Case Nos. 3:21-md-02981-JD; 3:20-cv-05761-JD; 3:21-cv-05227-JD

